

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

v.

Case No. 1:23-cv-01346

TERRAFORM LABS, PTE. LTD. and DO
HYEONG KWON,

**DECLARATION OF DOUGLAS W. HENKIN IN SUPPORT OF DEFENDANTS'
MOTIONS IN LIMINE**

Douglas W. Henkin declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted to practice law before this Court and a partner with the law firm of Dentons U.S. LLP, counsel for Defendant Terraform Labs Pte. Ltd in the above-captioned action. I make this Declaration in support of Defendants' Motions in Limine. This declaration is based on my personal knowledge except as otherwise indicated.

2. Attached hereto are true and correct copies of the following documents:

Exhibit Number	Exhibit Description
A	Pl.'s Pre-Trial Disclosures
B	Kuan Deposition Transcript
C	DiSomma Dep. Ex. 4 [REDACTED]
D	TFL_SEC_00219392, [REDACTED] [REDACTED]
E	[REDACTED] Transcript
F	[REDACTED]
G	[REDACTED] Transcript

H	SEC Trial Ex. 123b
I	SEC Trial Ex. 122a-b (122a is the audio file, 122b transcript is included for filing)
J	SEC Trial Ex. 123a-b (123a is the audio file, 123b transcript is included for filing)
K	SEC Trial Ex. 124a (124a is the audio file, 124b transcript is included for filing)
L	SEC Trial Ex.124b
M	SEC Trial Ex.125a (125a is the audio file, 125b transcript is included for filing)
N	SEC Trial Ex.125b
O	SEC-HO-14164-E-0002724
P	Luu Deposition Transcript
Q	TFL_SEC_00202807
R	TFL_SEC_00281339
S	TFL_SEC_00281340
T	Pl.'s Fourth Am. R. 26(a) Initial Disclosures dated October 2, 2023
U	Email dated January 15, 2024 from James P. Connor

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 15, 2023

/s/ Douglas W. Henkin

Douglas W. Henkin
DENTONS US LLP
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 768-6832
Facsimile: (212) 768-6800
Douglas.henkin@dentons.com